

EXHIBIT A



U.S. Department of Justice

United States Attorney
District of Vermont

United States Courthouse and Federal Building
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Burlington, Vermont, 05401-0570

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May 1, 2024

Via USAfx

Susan K. Marcus, Esq.
Law Firm of Susan K Marcus LLC
29 Broadway Suite 1412
New York, NY 10006

Re: Expert Disclosure - *United States v. Serhat Gumrukcu*

Dear Susan,

The United States contends that some of the anticipated testimony provided in the disclosures is lay witness testimony under Rule 701 and, therefore, does not need to be disclosed as potential expert testimony pursuant to Rules 702 and 703 of the Federal Rules of Evidence. Additionally, some of the testimony provided by experts will not contain opinion testimony. However, in an abundance of caution, the following disclosures are provided pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G).

1. Elizabeth M. Bundock, Chief Medical Examiner, Vermont Office of the Chief Medical Examiner and Steven L. Shapiro, (retired) former Chief Medical Examiner, Vermont Office of the Chief Medical Examiner.
2. Hannah E. Erwin, Digital Forensic Examiner, Federal Bureau of Investigation and Roderick W. Link, III, Computer Scientist, Federal Bureau of Investigation.
3. Emine Fougner, Translator, JTG Inc. (We anticipate some additional material in the near future.)
4. Kevin P. Hoyland, Special Agent, Federal Bureau of Investigation. (We have included files identifying AT&T and Verizon tower lists from NDCAC used by Agent Hoyland as reference in his analysis.)
5. Kristen L. Scott, Senior Digital Investigative Analyst, U.S. Department of Justice Cybercrime Lab.
6. Richard Westfall, Forensic Accountant, Federal Bureau of Investigation.
7. Justin Woodford, Special Agent, Federal Bureau of Investigation.

The government may call FBI Digital Forensic Examiner Vicki Klemz and FBI Digital Forensic Examiner Baldwin Ditrin. Examiner Klemz extracted data from various devices seized at Mr. Gac's residence in Minnesota in early 2018 and Mr. Ditrin has supervised

extractions of various devices for FBI Albany CART Team. We don't believe that expert disclosures are necessary for these witnesses who merely conducted extractions but out of an abundance of caution we have included their CVs.

Please let us know if you have any questions.

Sincerely,

NIKOLAS KEREST
United States Attorney

By: /s/ Paul Van de Graaf
Paul Van de Graaf
Zachary B. Stendig
Assistant U.S. Attorneys

cc: Ethan A. Balogh, Esq. (letter only)
Lisa B. Shelkrot, Esq. (letter only)